

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA,)	
)	
v.)	Crim. No. 1:24-cr-180-PTG-1
)	
RAYMOND RAHBAR,)	
Defendant.)	

**DEFENDANT RAHBAR'S MOTION TO DISMISS COUNT 13 OF THE
SUPERSEDING INDICTMENT FOR FAILURE TO STATE AN OFFENSE**

COMES NOW the Defendant Raymond Rahbar, through counsel, and respectfully moves this Court, pursuant to Federal Rule of Criminal Procedure 12(b)(1), to dismiss Count 13 of the Superseding Indictment (Dkt. 38, Aggravated Identity Theft) for failure to state an offense, on the grounds set forth in the Memorandum of Law filed simultaneously herewith.

Dated: November 19, 2024

Respectfully submitted,

/s/

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/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was filed by CM/ECF on this the 19th day of November, 2024, which will then send a notification to all counsel of record.

/s/

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